

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

\*

BRUCE ALLEN LILLER

\*

**Plaintiff**

\*

VS.

\*

**CASE NO.: MJG-02-CV-3390**  
(Consolidated with MJG-02-CV-3391)

**ROBERT KAUFFMAN, et al.**

\*

**Defendants and  
Third-Party Plaintiffs**

\*

\*

v.

\*

**ROGER LEE HELBIG**

\*

**Third-Party Defendant**

\*

\*

**ANSWER TO DEFENDANTS MOTION IN LIMINE TO PRECLUDE  
TESTIMONY OF CHARLES COHEN, PhD.**

Plaintiffs, Bruce Liller, Michael Liller, Mary Liller, and Dwight Liller, by and through their attorney, Arnold F. Phillips, Esq., says as follows:

1. That Plaintiffs deny the allegations made in Defendants Motion for reasons outlined in the attached memoranda.

/S/ Arnold F. Phillips, Esq  
PO Box 537  
McHenry, MD 21541  
(301) 387-2800

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, that on this 18<sup>th</sup> day of February, 2004, the foregoing was electronically mailed to:

**Kathleen M. Bustraan, Esquire  
Jennifer S. Lubinski, Esquire  
Lord & Whip, P.A.,  
Charles Center South, 10<sup>th</sup> Floor  
36 S. Charles Street  
Baltimore, Maryland 21201  
Attorney for Defendant's and Third-Party Plaintiffs**

**AND**

**Donald L. Speidel, Esquire  
Law Offices of Progressive Casualty Insurance Co.  
800 Red Brook Boulevard Suite 120  
Owings Mills, MD 21117**

**AND**

**Toyja E. Kelley, Esquire  
Tydings and Rosenberg, LLP  
100 East Pratt Street  
Baltimore, Maryland 21202.**

Attachments

- Exhibit A      VITA of Jeroen Walstra
- Exhibit B      Cohen Report on Michael
- Exhibit C      Cohen Report on Bruce
- Exhibit E      Plaintiffs Rule 26(a)(2)
- Exhibit G      Deposition pages of Cohen 48-50